

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. NO. 04-CV-10521-GAO

BETTY ANNE WATERS, as Administratrix of the
Estate of KENNETH WATERS,

Plaintiff

v.

TOWN OF AYER, NANCY TAYLOR-HARRIS, in Her
Individual Capacity, ARTHUR BOISSEAU, In His
Individual Capacity, WILLIAM ADAMSON, in His
Individual Capacity and PHILIP L. CONNORS, in His
Individual Capacity,

Defendants

DEFENDANT PHILIP L.
CONNORS' MOTION FOR
SUMMARY JUDGMENT

Now comes the defendant, former Ayer Police Chief Philip Connors ("Connors"), and hereby moves, pursuant to Fed.R.Civ.P. 56(b), for summary judgment on all claims against him as set forth in the Amended Complaint.

As grounds therefor, Chief Connors states that there exists no genuine issue as to any material fact, and that he is entitled to judgment in his favor as a matter of law. As further grounds therefor, Chief Connors relies on the attached Local Rule 56.1 Statement of Material Facts Not In Dispute, and attached supporting memorandum of law.

WHEREFORE, Chief Connors respectfully requests that this Court enter judgment in his favor on all claims set forth against him in the Amended Complaint.

DEFENDANT PHILIP L. CONNORS,
By his attorneys,

/s/ Joseph L. Tehan, Jr.

Joseph L. Tehan, Jr. (BBO # 494020)

Gregg J. Corbo (BBO # 641459)

Kopelman and Paige, P.C.

101 Arch Street, 12th Floor

Boston, MA 02110

(617) 556-0007